

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PATRICIA MENDEZ,	)	
	)	
Plaintiff,	)	
	)	Case No. 08-cv-1216
v.	)	
	)	
SIEBERT GROUP 1, LLC-S.G. SERIES	)	Judge Milton Shadur
4, PHILLIP SIEBERT, as owner of Siebert	)	
Group 1, LLC-S.G. Series 4 and in his	)	
individual capacity, THOMAS ISCHKUM,	)	
KAREN ISCHKUM, GSF MORTGAGE	)	
CORPORATION, MORTGAGE	)	
ELECTRONIC REGISTRATION	)	
SYSTEMS, INC., COUNTRYWIDE	)	
HOME LOANS, INC., and UNKNOWN	)	
OCCUPANTS AND NONRECORD	)	
CLAIMANTS,	)	
	)	
Defendants.	)	

**AGREED MOTION FOR EXTENSION OF TIME TO ANSWER**

Defendants Mortgage Electronic Registration Systems, Inc. (“MERS”) and Countrywide Home Loans, Inc. (“Countrywide”), by and through their attorneys, move this Court to enter an Order granting MERS and Countrywide an extension of time, up to and including March 25, 2008, in which to respond to Plaintiff’s Complaint. In support of this Motion, MERS and Countrywide state as follows:

1. On February 28, 2008, Defendants removed this case from the Circuit Court of the Eighteenth Judicial District, DuPage County. MERS’s and Countrywide’s Answer is currently due March 6, 2008.

2. MERS and Countrywide need additional time to conduct an appropriate investigation of the factual and legal bases of the allegations in Plaintiff's Complaint in order to prepare a proper response thereto.

3. This Motion is not made for the purpose of delay, and Plaintiff will not be prejudiced by the short extension requested.

4. Plaintiff's counsel was contacted on March 3, 2008, and Plaintiff's counsel consents to this Motion.

WHEREFORE, Defendants Mortgage Electronic Registration Systems, Inc. and Countrywide Home Loans, Inc. pray that this Honorable Court enter an Order granting an extension, up to and including March 25, 2008, within which to file a response.

Dated: March 3, 2008

Respectfully submitted,

BRYAN CAVE LLP

By: /s/ Jena Valdetero  
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*Attorneys for Countrywide Home  
Loans, Inc. and Mortgage Electronic  
Registration Systems, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was served via U.S. Mail, this 3rd day of March, 2008, to:

Prairie State Legal Services, Inc.  
Elizabeth Newkirk Jahoda  
Ana Collazo  
Eliot Abarbanel  
350 S. Schmale Rd., Suite 150  
Carol Stream, IL 60188

And via the Court's electronic docketing system to:

Raymond Ostler  
Gomberg, Sharfman, Gold, and Ostler, P.C.  
rostler@gsgolaw.com

/s/ Jena Valdetero  
Jena Valdetero